		NPDE	
		TSC	A XXXXXX
		AI	
		OTHE	CR
	FV 89 REGT	ON III ESD	
		ACKING SYSTEM	
Facility Name:	OXY-CHEM	Type of Ins	spection: RCRA-CEI
Address:	RIVER ROAD DELAWARE CITY DELAWARE 19706	Date of ins	spection: 3/28/89
Daniel (ID Number)		Date of	Report:
Permit/ID Number:	DED003913266	Inspector and	Office: HOUGHTON CRL
CHECK APPLICAB	LE		
Major Munici Federa Joint Oversi	1	XXXXX	Minor Industrial Violations (Describe)
Other	2010 Hoey l	107	Date: 5-15-89
Comments: N	o apparent violat	tions of the RC	CRA regulations

Media:

RCRA Compliance Evaluation Inspection

OXY-CHEM
Occidental Chemical Corporation
Electrochemical, Detergent & Specialty Products
River Road
Delaware City, Delaware 19706

Telephone Number: B@2:834-3947

Date of Inspection: March 28, 1989

EPA Representative:

George H. Houghton

Environmental Protection

Specialist

Charleen Harrison

Hazardous Waste Enforcement

Branch

Ruth Rzepski

Hazardous Waste Enforcement

Branch

State Representative:

Jay Brahmbatt

Environmental Engineer

Facility Representative:

Robert Moore (not present)

Plant Manager

Richard L. Timmons Technical Manager

Jess A. Vargo, Jr. Principal Engineer

BACKGROUND

Oxy-Chem, located in Delaware City, Delaware was chosen for a RCRA-Compliance Evaluation Inspection to determine compliance with the hazardous ste regulations and determine the status of the hazardous waste surface impoundment. This facility was formerly owned and operated by Diamond Shamrock.

PERMIT STATUS

Oxy-Chem has submitted closure plans for all hazardous waste management areas including the surface impoundment. After the approval of the closure plans the facility will be a generator of hazardous waste storing for less than 90 days. Currently, the facility is a generator and storer of hazardous waste for greater than 90 days.

At the time of this inspection the facility is awaiting action from the regulatory agencies for the closure plans.

FACILITY DESCRIPTION

Oxy-Chem uses a mixture of solar salt and water (brine) to produce chlorine, hydrogen gas, potassium hydroxide and sodium hydroxide. The driving force behind this reaction is electricity. Mercury is used for the cathode. The facility has 88 cells to produce these products.

The hazardous waste generated by this process is K106, K071 and D009.

INSPECTION OBSERVATIONS

Delisting Petition

The delisting petition submitted in 1987 by Oxy-Chem for the K071 waste has not been approved or rejected as of this inspection.

Surface impoundment

Oxy-Chem stopped using their surface impoundment on November 8, 1988. A memo directed to facility personnel states the same policy. A copy of this memo is attached for your information. This inspector observed the impoundment and noted the lack of recent activity at the site. An amount or water was observed at one end of the impoundment. According to the facility representative, the water resulted from recent rain and no the result of any process. There is an under drain system which collects impounded water and conveys it to a sump where it is pumped to the facility's WWTP. The water is then treated and discharged. The facility has inspected the impoundment almost daily since November as a part of a general facility inspection. A closure plan has been submitted to the regulatory agencies for this unit.

(Brine Sludge)

The Brine Sludge was disposed in the surface impoundment until November of last year. It has been the facility's policy to eliminate waste from the process about every six months. Since this waste can no longer be disposed in the surface impoundment the facility is constructing a dewatering system. This system will be ready in June of this year and the resultant sludge cake will be disposed off site. In addition to the dewatering, a second treatment process is being constructed to meet the criteria in the K071 delisting petition. According to the facility this

equipment will also meet the BDAT standards for the K071 waste in case the delisting petition is not granted and the waste must be disposed in accordance with the land disposal restrictions.

<u>k106</u> (WWTP sludge from the production of chlorine using a mercury cell)

This soft hammer waste is currently disposed off site since the closing of the facility surface impoundment. It is Oxy-Chem's intention to submit a delisting petition for this waste in June of 1989. Another Oxy-Chem facility has submitted a petition to EPA for this same waste.

ess than 90 day storage

Cell room

During the last EPA inspection this area was reported to be a satellite accumulation area. Oxy-Chem has changed its procedures and now considers this area to be less than 90 day storage. This inspector observed the cell area and found all containers to be covered and in good condition, not showing any signs of leaks or corrosion. Each container was marked with the words "hazardous waste", the container contents and the initial accumulation date.

Near the cell room was a 30 yard rolloff that contained D009 waste from facility maintenance. This dumpster was also marked with the words "hazardous waste", labeled D009 and dated "1-26-89". No leaks were noted. A tarp covered the rolloff except for one corner. It appeared the wind blew the tarp off this one small area.

20 yard and 30 yard dumpsters

These two dumpsters are used to accumulate K106 and D009 waste. Both of these dumpsters were covered, marked for contents, dated and showed no signs of deterioration. Inspections for this area are on record.

Greater Than 90 Day Storage

Drum Storage Pad

The drum storage pad appeared to be the same as in the last EPA inspection. All the drums were closed, dated, labeled and not showing any signs of leaks or deterioration. Aisle space was adequate. The pad itself was fenced and the surface of the pad did not show any cracks or similar problems. Capacity of the pad is 509 containers but less than 100 were stored there during this inspection. Documented inspections are maintained r this area.

Carbontetrachloride Tank

This covered, above ground tank appeared to be empty at the time of this inspection. The tank was labeled U211 and the words "hazardous waste" appeared on the outside of the tanks. This tank has secondary containment. Documented inspections are conducted for this tank.

Land Ban

Oxy-Chem submitted to the Regional Administrator a demonstration for M211 and K106 waste (attached). According to the facility, this uemonstration accompanied the waste manifest for the first shipment (manifest number 401679 11-10-88). Copies of the outgoing waste manifest with the land ban information is attached for your information. The information attached to the manifests appear to be appropriate for the waste being shipped.

There have been no offsite shipments of the K071 waste since the land ban regulations became effective. It appears the restricted waste stored on site is to facilitate the transportation and not circumvent the regulations.

SUMMARY OF FINDINGS

A RCRA Compliance Evaluation Inspection was conducted at Oxy-Chem on March 23, 1989 to determine compliance with the hazardous waste regulations. The facility appeared to be in compliance with the RCRA regulations at the time of this inspection.

LIST OF ATTACHMENTS

- Generator Checklist
- 2. TSD Checklist
- 3. Generator Checklist-Land Ban
- 4. RCRA Checklist for Tanks
- 5. RCRA Checklist for Surface Impoundments
- 6. Individual Documents
 - Cell Room checklist a.
 - Oxy-Chem Memo to stop using impoundment b.
 - Contract for disposal of hazardous waste Manifest 401660 C.
 - d.
 - Manifest 401662 e.
 - f. Manifest 401663
 - Manifest 401664 q.
 - Manifest 401673 h.
 - i. Manifest 401669
 - j. Manifest 401670

Generator Checklist 7

1-3-28-89 -

ame of	Facility:	Oxy-chem		
	of Facility:_	RIVER ROAD		
		Delaware C.ty, Del	1970	96
A I.D.	Number:	DED 003913266		
	le-Facility tative:	Richard Timmons	19	
	1 1	s hazardous waste at this generator:	1,	
		orine production through ory cell process- of produced as a by produ	,	
2.	NAC	ury cell PROCOSS-	wef.	
2.	Does the gene	ory cell process-	wef.	
2.	Does the general storage	erator perform the following on-site:	wet.	

261.4	3.	Is the facility subject to any exclusions for its hazardous waste?
		If yes, list the waste and the basis for exclusion:
-	•	Service and characteristic hazardous waste?
262.11(c)	4.	Does the facility generate any characteristic hazardous waste? Yes No
		If yes, describe how these characteristics were determined (testing, knowledge of process/materials used).
		Doog
		D009
	5.	Does the facility contemplate any changes in its operation from a hazardous waste generation or management perspective?
		Yes No
		If yes, describe: Applied for exclusion delisting
		FOR KO71 & K106 - close surface. Impound hents continue to use drumstorase
		+ tank for < 90 day storage.

Π.	Manifest System
	Complete this section only if facility ships hazardous waste off-site. 1988 ANNUAL Report Attacked
	 Identify the name and address of off-site facilities which have received waste from this generator.

	Name:	
	Address:	
	<u> </u>	
	I.D. No	
	Name:	
·	Address:	
ı		
•	I.D. No	
	Name:	
	Address:	
	I.D. No	
	Is the waste shipped off-site manifested on the Uniform Hazardous Waste Manifest (§262, Appendix)?	No
	If no, explain manifest system used:	
		-

If yes, inspect recent manifests and indicate whether they contain:

a. Name, Mailing address and EPA ID No. of generator?

Yes

No

b. The name and EPA ID No. of each transporter?

Yes

No

DOT waste description, including proper shipping name, No hazardous class and DOT identification number? No Number and type of containers (if applicable)? No Quantity of each waste transported?

Name, EPA ID number and site address of facility designated to receive the waste?

No

g. The following certification (effective Sept. 1, 1985)

(es)

No

"I Hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and environment."

262.23(a) 3. Did the generator:

a.	Sign and date_the manifest?	Yes	No
b.	Obtain the handwritten signature and date of acceptance from the initial transporter?	Yes	No
c.	Ensure that return copies of the manifest from the designated TSD facility were properly signed and dated?	(es)	No
d.	Retain a copy of the signed manifest?	(es)	No

Waste Accumulation

	a. Satellite Accumulation?	Yes	(MO)
	b. Less than 90 day storage?	Yes	No
Answ accu	er the following questions if the generator has satellit	e -	W/A
2.	Is satellite accumulation area(s) near the point of waste generation?	Yes	No
	If no, describe:	-/-	
3.	Are there multiple satellite accumulation areas for any that generates hazardous waste?	one pr	ocess No
	If yes, describe:		
4.	Is the waste stored in containers?	Yes	No
5.	Are containers in good condition?	Yes	No
	If no, explain:		_
6.	Are container(s) marked with the words hazardous waste or the actual contents of the container(s)?	Yes	No
7.	Are container(s) kept closed?	Yes	No
8.	Are any container(s) leaking?	Yes	No
	If yes, describe:		
	· /		
	3. 4. 5. 7.	Answer the following questions if the generator has satellit accumulation area(s). 2. Is satellite accumulation area(s) near the point of waste generation? If no, describe: 3. Are there multiple satellite accumulation areas for any that generates hazardous waste? If yes, describe: 4. Is the waste stored in containers? 5. Are containers in good condition? If no, explain: 6. Are container(s) marked with the words hazardous waste or the actual contents of the container(s)? 7. Are container(s) kept closed? 8. Are any container(s) leaking?	Answer the following questions if the generator has satellite accumulation area(s). 2. Is satellite accumulation area(s) near the point of waste generation? If no, describe: 3. Are there multiple satellite accumulation areas for any one pr that generates hazardous waste? Yes If yes, describe: 4. Is the waste stored in containers? Yes If no, explain: 6. Are container(s) marked with the words hazardous waste or the actual contents of the container(s)? 7. Are container(s) kept closed? 8. Are any container(s) leaking? Yes

Does the generator utilize the following types of waste accumulation:

262.34(E)(1) 9.	Has generator accumulated more than 55 gallons of hazard or more than 1 quart of acutely hazardous waste(s) in a accumulation area?	dous was satelli	te(s) te
	accumulation areas	Yes	No
	If yes:		
262.34(c)(2)	a. Are the container(s) holding excess waste dated as to when accumulation began?	Yes	No
	b. Does the excess waste comply with the less than 90 day storage requirements (40 C.F.R. 262.34(a) within 3 days of the time when accumulation began?	Yes	No
<u>NOTE</u> :	Pennsylvania regulations do not contain an explicit profor satellite accumulation areas. Generator facilities Pennsylvania that employ satellite accumulation must no for more than 90 days, otherwise they are a TSD facilit	t store	
Answer th	ne following questions if the generator has less than 90	day stor	age.
262 (a)(1) 10.	What is the method of waste storage:		
-	Containers?	(Yes)	No
	Tanks?	Yes	No
	Other?	Yes	(No
	If other, describe:	· · ·	
62.34(a)(4) 11.	Does the facility maintain personnel training and other required in 40 C.F.R. §265.16?	record (Yes)	s No
	If no, explain: manddary - yearly updates &	Records	
4 ,	type of training - name - Job title	-dat	<u> </u>
	Training + 913Mature		,
262.34(a)(4) 12.	Does the facility maintain an adequate preparedness an program as required in 40 C.F.R. 265 Subpart C?	d preven	tion No

262.34(a)(4)	13.	Has the facility prepared a Contingency Plan that sarrequirements of 40 C.F.R. 265 Subpart D? If no, explain:	(es)	No
	•	the Sallawing questions if the generator uses cont	ainer	
	stor	er the following questions if the generator uses cont age:	arner	
262.34(a)(2)	14.	Are all container(s) marked with the words "Hazardou the date that waste accumulation in that container b	s Waste" egins?	and
			Yes	No
262.34(a)	15.	Based upon accumulation dates, have any container(s) storage for more than 90 days?		
		•	(Yes)	Ю
265.173(a)	16.	Are container(s) kept closed?	(Yes)	No
265.171	17.	Are container(s) in good condition:	(Yes)	No
		If no, explain:		
252 373	10		(Yes)	No
262.171	18.	Are any container(s) leaking? If yes, describe:		
-	•			
265 374	19.	Is the storage area(s) inspected at least weekly and adequate inspection record/log maintained?	\sim	
265.174			_(Yes)	No

265.177(6)	20.	Are incompatible wastes properly separated or protection one another while in storage?	ted Yes	No	N/A
	•	If no, explain:			
					
265.176	21.	Are containers holding ignitable or reactive waste least 15 meters (50 feet) from the facility's proper	located a	at ?	
			Yes	No) (N/A)
Answe Mary	er the	e following questions if the facility is located in	Pennsyl va	ania (Dyd.
Pa-75.265(q) (10)	22.	Does the container storage and receiving area have a large* containment system capable of collecting and leaks and precipitation?	a suffic holding	iently spil	y ls,
Md-1 1.05.09	9	reaks and precipitations	Yes	N	0
(H)(1)		If no, explain:			
	•				
a-75.265(q) (12)	23:	Is there any escape or overflow of spilled or leake accumulated precipitation from the sump or collecti	d waste on syste	or m?	
d-10.51.05.09 (н)(з)			Yes	No	N/A
(117107		If yes, describe:			
I					
a-75.265(q) (11)	24.	Is there a means to prevent run-on from entering the system?			
1d-10.51.05.09	•		Ye	35	No
(H)(2)	-*/	t least-10%-of-the-volume-of-all containers or the	<u>volume of</u>	f_the	larges
		container, whichever is greater.			

Answer the following questions if the facility is located in Pennsylvania 75.265(q)(14) 25. Do storage containers exceed any of the following heights? Six feet for indoor storage of reactive or ignitable wastes? N/A No Yes Nine feet for outdoor storage of reactive or jgnitable wastes? . No N/A Yes c. Nine feet for indoor or outdoor storage of non-reactive or nonignitable wastes? No N/A Yes Is there a minimum 40 foot setback from a building for all 75.265(a)(14) 26. outdoor container storage of reactive or ignitable wastes? No N/A Yes Is there at least a five foot wide aisle around each group 75.265(q)(14) 27. of containers in either indoor or outdoor storage? No Yes Is there a main aisle or accessway at least 12 feet wide 28. 75.265(q)(14) maintained through a container storage area? No Yes

Answer the following question if the generator uses tank storage and complete the checklist for tanks.

262. (1)(3) 29. Is the tank(s) labeled or clearly marked with the words "Hazardous Waste"?

No

Yes

Recordkeeping and Reporting Does the generator prepare an Exception Report and submit MIP 62.42(b) it to the appropriate agency if a signed copy of the manifest is not received within 45 days of the date the waste was accepted by the initial transporter? Yes No (30 days for Maryland facilities) Does the Exception Report include: 2. 62,42(b) Yes No Legible copy of the manifest Cover letter explaining generator's efforts to locate waste and the No Yes results of those efforts? If the generator ships any hazardous waste off 62.41(a) 3. site, does it prepare an Annual Report and N/A submit it to the appropriate State agency? No (quarterly reports for Pennsylvania facilities) Does the Annual Report include: -:62.41(a) Description and quantity of hazardous waste No shipped off-site? Name(s) of TSD facilities receiving No waste(s)? Efforts undertaken during the year 262.41(a)(6) to reduce the volume and toxicity of No the hazardous waste? Description of the change in volume 262.41(a)(7) and toxicity of the waste actually No achieved? Does the generator retain copies of signed

manifests from designated TSD facilities Annual Reports, Exception Reports and

(does not pertain to Pennsylvania facilities)

test results for a minimum of 3 years?

262.40(a)(b)(c) 5.

	Answer to	he following questions if the generator is located in ania	n //	p.	
5.262(h)(1) 6.	Does the generator retain a copy of each manifest that has been properly signed for a period of at least 20 years	Yes Yes	No No	
5.262(h)(2) 7.	Does the generator retain a copy of each quarterly report and Exception Report for a period of at least 20 years?	Yes	No	
5.262(h)(3) 8.	Does the generator retain records of any test results, waste analysis, etc. for a period of at least 20 years?	Yes	No	
5.262 /~ \(1) 9.	Does the generator notify PA DER of a discharge or spill of hazardous waste which are in amounts greater than the appropriate reportable quantities or any quantities which enter surface or ground water?	Yes	No	N/A
5.262(m)(4) 10.	Does the generator file a written report on any reportable hazardous waste discharge or spill with PA DER within 15 days after the incident?	Yes	No	N/A
5.262(m)	(5) 11.	Has the generator developed and implemented a contingency plan approved by PA DER?	Yes	No	

٧.	Small Quantity Generators	N)	n	
	Answer the following questions if the generator generates a total quantity of hazardous waste between 100 kg and 1000 kg per month.	,		
262.34(d)(1)	 Does the quantity of waste accumulated on-site exceed 6000 kg 	Yes	No	
262.34(d)(e)	2. Is the waste accumulated on-site for greater than 80 days (or for more than 270 days if waste must be trans- ported over 200 miles)?	Yes	No	
	3. If waste is accumulated on site			
262.34(d)(2)(3)	a. Does the generator comply with either the container regulations found in 40 C.F.R. 265 Subpart I (except §265.176) or the tank regulations contained in !265.201 (40 C.F.R. 265 Subparet J), which ever is appropriate?			
		Yes	No	
262,34(d)(4)	b. Does the generator mark all containers with the date that waste accumulation begins?	Yes	No	N/A
265.34(d)(4)	c. Does the generator mark each container or tank with the words "Hazardous Waste"?	, 0.5	•	
,	naste i	Yes	No	
265. (1)(4)	d. Does the generator comply with the "Preparedness and Prevention" requirements contained in 40 C.F.R. 265			

Is there an emergency coordinator either on the premises or on call at all times?

No

-Yes----No---

Yes

Subpart C?

262.34(d)(5)(i)

			•	
62.34(d) (5)(ii)	f. Has the generator posted the following information next to a telephone			NP
	name and telephone number of emergency coordinator?	Yes	No	1
	location of fire extinguishers, spill control material, fire alarms, etc?	Yes	No	
	telephone number of fire department unless direct alarm available?	Yes	No -	
262.34(d)(5) (iii)	g. Has the generator ensured that all appropriate employees are thoroughly familiar with proper waste handling and emergency procedures?	Yes	No	
262.20(e)	Does the generator use an acceptable manifest system when shipping hazardous waste off-site unless the waste is reclaimed under a proper contractual agreement?	Yes	No	
	If no, explain			
262.44 5.	Does the generator retain copies of manifests and records of test results or waste analyses for at least three years? Comments:	Yes	No	
				

	RCRA CHECKLIST FOR INSPECTION OF TSD FACILITIES	RO US	E	
, b	Name of Facility: OXY-Chem (3-28-89)	Inspection	File	
	Address: River Rond	No.		
	Delaware City, Del 19706	Reviewer		
	EPA TSD ID Number: DED 00 3913266	Date review	ed	
	Facility Inspection Representative: Richard Timmons	Form "B"		
	Title: Technical Manager			
	Telephone: 302 - 834 - 3831			
	SITE CHARACTERIZATION (Please denote if the facility preor disposes of hazardous waste. priate sub-category that occurs a facility.) TREATER STORER Filtration Open Pile Incineration Surface Impoundment Thermal Reduction Above ground tank(s) Chem/Phys/Bio Treatments Below ground tank(s) Waste Oil Other SITE CHARACTERIZATION (Please denote if the facility preor disposes of hazardous waste. priate sub-category that occurs a facility.) TREATER STORER Surface Impoundment Above ground tank(s) Other	Also, mark th t the particu DISPOSER	e appro- lar .1 opera ceatment	- tio
	INSPECTION PROCEDURE		\sim	
	1. Does the facility generate hazardous waste?		(Yes)	N
	Note: Please complete the generators checklist, Numbers thru 8, if the TSD facility generates hazardous wastes ware disposed off-site.	1 hich		
65.13	2. Does the on-site or off-site facility have a written was analysis plan?	te	Yes	N
65.14	3. Does the TSD facility have a 24-hour surveillance system monitors and controls entry to the active portion of the except for Surface Impound If Not ments	which facility?	Yes	N
	A. Does the facility have an artificial or natural boun which surrounds active portions of the facility and,	dary	Yes	1
	B. Does the facility have means to control entry at all i.e., gates, attendants, locked entrances, etc.?	times,	Yes	N
65.14	4. Does the TSD facility have a restricted access sign post each entrance to the active portion of the facility? An example would be: "Danger-Unauthorized Personnel Keep O	L	Yes	N

., ., .,	/ -2-		
65:15	5. Does the TSD facility have a written schedule for inspecting all emergency equipment and monitoring equipment, security devices, and operating and structural equipment.	Yes	N
65.16(a)	6. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waster management procedures?	Yes	Ñ
65.16(d)	7. Does the TSD facility maintain a record of job titles for all personnel that are involved with the handling of hazardous waste and the name of the employee filling each job?	Yes	N
65.16(d)	8. Does the TSD facility have on record a written position description for each job title noted in Question #7?	ves	Ŋ
65.16(d)	9. Does the facility mantain a written description for the type and amount of introductory and continuing training for those employees noted in Question #7?	Yes	Ŋ
65.32	10. Does the TSD facility have installed the following equipment:		
 t.	A. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion?	Yes	ì
-	B. A device at the scene of hazardous waste TSD operations capable of summoning emergency assistance from Police, Fire departments, etc.?	Yes	ì
	C. Fire control equipment and an adequate supply of fire fighting water or fire supression chemicals?	Yes	ī
65.35	11. Does the TSD facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies?	Yes	1
65.52(a)	12. Does the facility have a contingency plan which contains the following elements:	Yes	1
	A. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water?	Yes	ì
65- ,-5 2-(-e)	B. A detailed description of arrangements formally agreed to	Yes	1
	by local police, fire departments, and State and local emergency teams to provide assistance during emergency situations? Mutual Ade Agreement _ Care programment _ c		
.65.52(d)	C. A listing of names, addresses, and phone numbers of the TSD facility emergency response coordinators? Note: This listing should include names and phone numbers of emergency coordinators available on twenty-four hour basis.	(Yes)	1
:65.52(e)	D. A list of appropriate emergency equipment necessary to cope with emergencies at the TSD facility?	Yes	1
٠			

			~ J~		
5.55	13.	on-cal	he facility have at all times at least one employee either l or on the site who is responsible for coordinating all ncy response measures?	Yes	Nc
	14.		he on-site or off-site facility have a written operating which contains the following information:		
65.73(b)(i)		re	description and the quantity of each hazardous waste ceived/managed at the on-site or off-site treatment, orage or disposal facility.	es	Νc
5.73(ъ) (2)			e location of each hazardous waste managed at the on-site off-site facility.	es	Nc
5.73(b)(3)			pies of facility specific waste analysis as required by 88 5-193,265-225,265-252,265-273,265-345,265.375 and 265.402.	Xes)	Nc
5.73(b)(3)& 5.13			itten results of all chemical/Physical analyses of each ste treated, stored or disposed of at the facility.	Yes	Nc
5.73(4)		E. Su	mmary reports of incidents requiring implementation of the H/A	Yes	Nc
5.73(b)(5)& 5.15(d)			cords and results of all inspections (see #5) in an inspection g or summary.	Yes	Nc
5.73(b)(6)			sults from groundwater monitoring (For surface impoundments, and treatment or land disposal facilities). Attacked	(Yes)	Nc
5.73(b)(7)		H. Cl	osure cost estimate.	Yes	No
		I. Po	st Closure cost estimate (land disposal facilities only)	<u>Yes</u>	No
5.110	15.	closur	te TSD facility operator completed a written closure or post to plan in order to meet the May 1981 date for implemntation as exercises?		
			he TSD facility have: witten Closure Plan	6 5	Иc
		B. Wr	ritten Post Closure Plan (land disposal Facility only)	(fes	Nc
	16.	Does t	the TSD facility receive waste from off-site generators?	Yes	<u> </u>
		If yes	, does the operator implement the following procedures:	_	
65.13(a)(4)			spect or analyze incoming wastes and compare with manifest for shipment received at the facility.	Yes	Nc
.65.13(Ъ)			ecify procedures in the waste analysis plan to carry out #16A.	Yes	Nc
65.71		C. Si	gn and date all manifest copies?	Yes	No
:65.71		D. Re	turn copies of the manifest to the generator and transporter?	Yes	No
:65.71		E. Re	etain copies of all manifests at the facility for three years?	Yes	No
	1				

Questions 17-22 apply to surface impoundments, land treatment and land disposal facilities.

, ,		1		
	17.	Has the operator installed a groundwater monitoring system which consists of:	Yes	No
5.91	A.	At least one well hydraulically upgradient at the limit of waste management area?	Yes	No
	в.	At least 3 wells hydraulically downgradient at the limit of the waste management area?	Yes	No
5.91(c)	18.	Are all monitoring wells cased in a manner to prevent contamination of samples and groundwater?	Yes	No
5.90(a)	19.	Do wells monitor groundwater in the uppermost aquifer underlying the facility? Colombin Acquater 30-50ft	Yes	Nc
5.92(a)	20.	Has the operator developed and followed groundwater sampling and analysis plan?	Yes	Nc
	21.	Does the plan include methods for establishing concentrations of parameters characterizing	Yes	Nc
-	Α.	Groundwater Suitability (265.92(b)(1)	Yes	Νc
	В.	Groundwater quality (265.92(b)(2)	Yes	Nc
	c.	Groundwater contamination (265.92(b)(3)).	(es)	Nc
	22.	Has the groundwater monitoring program been implemented by a qualified geologist or geotechnical engineer?	Yes	Nc
	23.	The inspector should check for the following conditions at the TSD facility:	•	•
	Α.	Open fires	Yes	E
	В.	Fumes or gases	Yes	Ø
	c.	Leaks or corrosion in containers or other storage structures	Yes	A)
	D.	Leachate to receiving streams	Yes _.	B
	E.	Malfunction of equipment	Yes '	N
- <u> </u>	F.	Bulging drums	Yes—	- (N)
	G.	Excessive heat generation from storage facilities, lagoons, storage piles, etc.	Yes	(N,
	24. .	Please provide detailed comments and explanations on specific c items or problems encountered during the TSD facility inspectio instance, industry requests for clarification of specific rules regulations and their applicability at the facility can be note or described in a separate memo attached to the inspector's che	n. For and d below	
,	<u> </u>			ļ

Generator Checklist - Land Ban Inspections

ĸ

268.30	1.	Does the facility generate F - solvent wastes (i.e., F001 - F005)?	Yes	No
268.31	2.	Does the facility generate Dioxin wastes (i.e., F020, F021, F022, F023, F026, F027 or F028)?	Yes	No
268,32	3.	Does the facility generate waste on the California List (see definition below)?	Yes	No
		Liquid - pH < 2	Yes	No
		Liquid - PCB > 50 ppm	Yes	No
		Liquid/Non-Liquid - HOC >1000 mg/l	Yes	No
, -		Liquid - Cyanides > 1000 mg/l	Yes	No
→		Liquid - Metals as follows	Yes	No
		Arsenic ≥ 500 mg/l Cadmium ≥ 100 mg/l Chromium ≥ 500 mg/l Lead ≥ 500 mg/l Mercury ≥ 20 mg/l Nickel ≥ 134 mg/l Selenium ≥ 100 mg/l Thallium ≥ 130 mg/l		
268.10	4.	Does the facility generate any waste on the first third list?	Yes	No
;)		If yes, circle the appropriate ones on the attached listing.		
261.31	5.	Is there evidence to indicate that an FOO1 - FOO5 solvent waste was misclassified as a listed "U" waste?	Yes	No N/A
		If yes, describe		
			-	
		· · · · · · · · · · · · · · · · · · ·		
			ı	
			,	

					•
		If yes, describe			
	9.	Is there evidence to indicate that a treatability group (i.e., wastewater (≤ 1% TOC) or other) of a F solvent waste was incorrectly determined?	Yes	No (N	/A)
		If yes, was the most stringent treatment standard for the constituent(s) shown on the notification?	Yes	No	
68.41(b)	8.	Does the generator mix restricted wastes having different treatment standards for the same constituent(s) prior to shipping off-site?	Yes	16 0	
		If yes, describe:			
· ·	7.	Have any hazardous wastes been reclassified recently from one list code to another thereby impacting its LDR status?	Yes	No	
					·
		If yes, describe			
	0.	"F", "K", "P" or "U" listed waste may qualify as a California List waste because of HOC, metals or cyanide content?	Yes	No N/	A

Subpart B—Schedule for Land Dispos-el Prehibition and Establishment of Treatment Standards

Source 51 FR 19305, May 28, 1986, unless otherwise noted.

\$268.10 Identification of wastes to be evaluated by August 8, 1988.

EPA will take action under sections 3004(g)(5) and 3004(m), of the Resource Conservation and Recovery Act, by August 8, 1988, for the following wastes (for ease of understanding the wastes have been listed by the section of 40 CFR Part 281 under which sludge from the petroleum refining industion of 40 CFR Part 261 under which they were listed):

\$ 261.31 Wastes

F006-Wastewater treatment aludges from electroplating operations except from the following processes: (1) Sulfuric acid anodizing of aluminum; (2) tin plating on carbon steel; (3) zinc plating (segregated basis) on carbon steel; (4) aluminum or zinc-aluminum plating on carbon steel; (5) cleaning/stripping associated with tin, sine and aluminum plating on carbon steel; and (6) chemical etching and milling of aluminum.

F007cyanide plating bath solutions from electroplating operations.

F008—Plating bath sludges from the bottom of plating baths from electroplating operations where cyanides are used in the Drocess.

F009-Spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process.

F019-Wastewater treatment sludges from the chemical conversion coating of aluminum.

\$ 261.32 Wastes

K001-Bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol.

K004-Wastewater treatment sludge from the production of zinc yellow pigments.

K008—Over residue from the production of

chrome oxide green pigments.

K011-Bottom stream from the wastewater 'n the production of acrylonitrile.

com stream from the acetonitrile strir X013 colu a the production of acrylonitrile.

K014—Bottoms from the acetonitrile purifi-

cation column in the production of acrylonitrile.

K015-Still bottoms from the distillation of benzyl chloride.

K016—Heavy ends or distillation residues from the production of carbon tetrachlo-

K017-Heavy ends (still bottoms) from the purification column in the production of epichlorohydrin.

AR018—Heavy ends from the fractionation column in ethyl chloride production. K020—Heavy ends from the distillation of

vinyl chloride in vinyl chloride monomer production. K021-Aqueous spent antimony catalyst

waste from fluoromethanes production. K022-Distillation bottom tars from the production of phenol/acetone from cumane.

K024—Distillation bottoms from the production of phthalic anhydride from naphthalene.

K030-Column bottom or heavy ends from the combined production of trichloroethylene and perchloroethylene.

K031—By-products salts generated in the production of MSMA and cacodylic acid. K035—Wastewater treatment aludges gener-

ated in the production of creosote. K036-Still bottoms from toluene reclamation distillation in the production of disulfoton.

₩837—Wastewater treatment sludge from the production of disulfoton.

₩X044-Wastewater treatment sludges from the manufacturing and processing of explosives.

K045 Spent carbon from the treatment of wastewater containing explosives.

K046-Wastewater treatment sludges from the manufacturing, formulation and loading of lead-based initiating compounds.

K047-Pink/red water from TNT operations.

K048 Dissolved air flotation (DAF) float from the petroleum refining industry.

K049—Stop oil emulsion solids from the petroleum refining industry.

try.

K051—API separator aludge from the petroleum refining industry.

R052—Tank bottoms (leaded) from the pe troleum refining industry.

K060-Ammonia still lime sludge from coking operations.

K061—Emission control dust/sludge from the primary production of steel in electric filmaces

★K062—Spent pickle liquor from steel finish ing operations in chlorine production.

K069—Emission control dust/sludge from secondary lead smelting.

**K071—Brine purification muds from the mercury cells process in chlorine production, where separately prepurified brine is not used.

K073—Chlorinated hydrocarbon waste from the purification step of the disphragm cell process using graphite anodes

K083—Distillation bottoms from aniline production.

K084—Wastewater treatment sludges generated during the production of veterinary pharmaceuticals from arsenic or organoarsenic compounds.

K085—Distillation of fractionation column bottoms from the production of chlorobenzenes.

K086-Solvent washes and aludges; caustic washes and sludges, or water washes and sludges from cleaning tubs and equipment used in the formulation of ink from pigments, driers, soaps, and stabilizers containing chromium and lead.

K087-Decanter tank tar sludge from coking operations.

K099-Untreated wastewater from the production of 2.4.D.

K101-Distillation tar residues from the distillation of aniline-based compounds in the production of veterinary pharmaceuticals from arsenic or organo-arsenic compounds.

K102-Residue from the use of activated carbon for decolorization in the produc-tion of veterinary pharmaceuticals from arsenic or organo-arsenic compounds.

K103-Process residues from aniline extraction from the production of aniline.

XX104—Combined wastewater streams generated from nitrobenzene/aniline produc-

K106-Waste water treatment sludge from the mercury cell process in chlorine proanction.

\$ 261.3Xe) Wastes

7001-Warfarin, when present at concentration greater than 0.3% P004—Aldrin P005—Allyl alcohol

P010—Arsenic acid P011—Arsenic (V) oxide

P012—Arsenic (III) oxide P015—Beryllium dust

P016—Bis-(chloromethyl) ether P018—Brucine

P020—Dinoseb P010—Soluble cyanide salts not elsewhere

P636—Dichlorophenylamine

ros7-Dieldrin -Disulfoton P041—Diethyl-p-nitrophenyl phosphate -2.4-Dinitrophenol P050—Endosulian 7058—Fluoracetic acid, sodium salt P059—Heptachlor P063—Hydrogen cyanide P068—Methyl Hydrazine P069—Methyllactonitrile P070—Aldicarb P071-Methyl parathion

P081-Nitroglycerine P082-N-Nitrosodimethylamine P084-N-Nitrosomethylvinylamine P087—Osmium tetraoxide P089—Parathion P092—Phenylmercuric acetate P094—Phorate

P097—Famphur P102—Propargyl alcohol P105—Sodium azide P108—Strychnine and salts

Pi10—Tetraethyl lead Pi15—Thallium (I) sulfate P120 Vanadium pentoxide .

Pi22—Zine phosphide, when present at con-

centrations greater than 10% Pl23-Toxaphene

\$ 261.33(f) Wastes

0007—Acrylamide U009—Acrylonitrile U010—Mitomycin C U012—Aniline U016—Benz(c)acridine U018—Benz(a)anthracene U019—Benzene U022-Benzo(a)pyrene U029-Methyl bromide U031—n-Butanol U036—Chlordane, technical U037—Chlorobenzene 0041—n-Chloro-2,3-epoxypropene 0043—Vinyl chloride 0044—Chloroform 0046—Chloromethyl methyl ether

U050—Chrysene U051—Creosote U053—Crotonaldehyde U061—DDT U063—Dibenz o (a, h) anthracene

U064—1,2:7,8 Dibenzopyrene U066—Dibromo-3-chloropropane 1,2-U067—Ethylene dibromide U074—1,4-Dichloro-2-butene U077—Ethane, 1,2-dichloro-

U078—Dichloroethylene, 1,1-U086—N,N Diethylhydrazine U089—Diethylstilbestrol U103—Dimethyl sulfate

U105—2,4-Dinitrotoluene U108—Dioxane, 1,4-U115—Ethylene oxide U122—Formaldehyde

U124—Furan **U129—Linda**ne

U130-Hexachlorocyclopentadiene U133—Hydrazine

U134-Hydrofluoric acid U137-Indeno(1,2,3-cd)pyrene U151—Mecury

U154—Methanol U155—Methapyrilene

U157—3-Methylcholanthrene U158—4,4-Methylene-bis-(2-chloroaniline)

U159—Methyl ethyl ketone U171—Nitropropane, 2-

U177—N-Nitroso-N-methylures U180-N-Nitrosopyrrolidine

U185—Pentachloronitrobenzene U188—Phenol U192—Pronamide

U200—Reserpine U209—Tetrachloroethane, 1,1,2,2-U210-Tetrachloroethylene

U211—Carbon tetrachloride

U219—Thioures U220—Toluene

U221—Toluenediamine U223—Toluene diisocyanate

U226—Methylchloroform U227-Trichloroethane, 1,1,2-U228-Trichloroethylene

Notsoftham

U237—Uracil mustard
U238—Ethyl carbanate
U248—Warfarin, when pri
tions of 0.3% or less
U249—Zinc phosphide, wi
centrations of 10% or let

ó

F006*	K073	P084	U 077	U248
7	83	87	78	249
8	84	89	86	
9	85	92	89	
19	86	94	103	
коо́1*	87 *	97	105	
4	99*	102	108	
0	100	105	115	
11	101	108	122	
8 11 13 14	102	110	124	
13	102*	115	129	
15*	104*	120	130	
157		122	133	
16*	(06)	123	134	
17	P001	123	137	
18*		U007.	151	
19*	4	9	154	
20*	.5	30	155	
21	10	10	157	
22	11	12	158	
24*	12	16		
30*	11 12 15 16	18	159	
31	16	19	171	
35	18	22	177	
36	20	29	180	
37*	30	31	185	
44*	3 6	36	188	
45*	37	37	192	
46	39	41	200	
47*	41	43	209	
48*	48	44	210	
49*	50	46	@	
50 *	· 5 8	5 0	219	
57*	5 9	51	220	
52*	63	53	221	
60	6 8	61	223	
61	69	63	2 26	
62*	70	64	227	
. 69	71	66	22 8	
<u>(11*)</u>	81	67	237	
	82	74	238	

* = Not_Soft_Hammer_

	10.	liquid classification of a California List waste was incorrectly determined (i.e., failure to perform paint filter liquids test?)	Yes	No	N/A
		If yes, describe			
	•				
	11.	Is there evidence to indicate that a wastewater/ non-wastewater (>1% TOC and >1% TSS) designation of a first third waste was incorrectly determined:	Yes	No	N/A
		If yes, describe			
68.3	12.	Is any restricted waste being diluted as a substitute for treatment?	Yes	No	
68.7(a)	13.	Did the generator determine its waste was restricted from land disposal by			
		a. testing the waste or an extract of the waste	Yes	No	
		b. knowledge of waste and the process from which it was generated?	Yes	No	

,I,	F the waste is shipped off-site, answer questions 17-19	
i8.7(a)(1)	14. Does the generator notify the treatment/storage facility of appropriate treatment standards or prohibition levels if waste exceeds these standards/levels?	(es) No N/A
i8.7(a)(2) 1	15. Does the generator submit a notice and certification to the treatment disposal facility that the waste can be land disposed if it meets the applicable treatment standards or prohibition levels?	Yes No N/A
i8.7(a)(3) 1	16. Does the generator submit a notice to the treatment/disposal facility that the restricted waste can be land disposed if subject to a case by case extension, an exemption or a nationwide variance?	· Yes No N/A
i8.7(a)(6)	7. Has the generator retained in on-site files	
	a. All data used to support the status of the waste (i.e., restricted or non restricted) including knowledge of waste and test results?	Yes No
	b. Copy of waste analysis plan?	(es) No N/A
•	c. Copies of all notices and certifications that were sent to treatment/disposal facilities? Zoberved in Siles	Yes No N/A
	Answer the following question if the generator stores on-site a restricted waste	
8.50(a)(1)	18. Is the restricted waste stored for accumulation to facilitate proper recovery, treatment or disposal?	Yes No
ì	Answer the following questions if the generator disposes of its soft hammar waste off-site in a landfill or surface impoundment	-
i8.8(a)(1)	19. Has the generator made a good faith effort to locate and contract with treatment/recovery facilities that are practically available and will provide the greatest environmental benefit?	Yes No

If a generator determines that there is no 1.8(a)(2)(i) 20. practically available treatment for its waste, does adequate documentation exist to substantiate this claim?

N/A Yes No

21. Did the generator submit a demonstration 3.8(a)(2) and certification to the Regional Administrator stating that a good faith effort was made to locate a suitable treatment or recovery facility? Submitted on

No (Yes)

Has the generator actually contracted with 3.8(a)(2)(ii)22. such a treatment/recovery facility? blanked Punchase order for set period

No of time

3

is a copy of the demonstration and/or 3.8(a)(3)certification submitted to the facility receiving the waste?

Yes No

does the generator retain copies of these B.8(a)(3)b. Yes (No) demonstrations and certifications?

RCRA Checklist for Tanks

(Subpart J Section	265.192	-	"General	Operating	Requirements")

R.O. USE

		Inspec	ction fil	e No:
Name of Faci	lity	: <u>Gxy-chen</u> 3-28-89 Review	wer:	
Address:		River Road		
		Delaware City, Del 19706 Date	Reviewed:	
EPA Generato	or ID	Number:	- 11	
Facility Ins	pect	tion Representative: R. Timmons	1 711	
Title:		technical Maga	J	
		: 302-884-3831		
The q :ion tanks to tre	s co	ntained in this checklist apply to owners and operators of facilit r store hazardous waste, except as Section 265.1 provides otherwise	ies that	use
Pert. Regs. 40 C.F.R. Part:				
265.17(b)	1.	Are all tanks in good condition, i.e., not showing signs of leakage, corrosion, or any other deterioration?	ies	No
265.192(c)	2.	Are uncovered tanks operated to ensure a minimum of 2 ft, of freeboard? Covered tank	Yes	No
265.192(c)	3.	If not, is the tank equipped with a containment structure (e.g., dike or trench), a drainage control system, or a diversion structure (e.g., standby tank) with a capacity that equals or exceeds the volume of top 2 ft. of the tank?	Yes	No
265.192(d)	4.	Are tanks with continuous inflow of hazardous wastes equipped */A with a means to stop this inflow (e.g., waste feed cut-off system or by-pass to a standby tank)?	ïes	Nō
265.193(a) (1) & (2)	5.	Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into No a tank used for storage or treatment?	A Yes	No.
265.194(a) (1)	6.	control equipment	(ies)	No
265.194(a) (2)	7.	Is data gathered from monitoring equipment (e.g., pressure and temperature gauges) at least once each operating day?	A Yes	No
265.194(a) (3)	8.	in the state of th		∷o

55.194(a) (4)	9. Is (are) the tank (or tanks) inspected weekly to detect corrosion or leaking of fixtures or seams?	Yes) ио	
	10. Are the results of these inspections recorded in an inspection log or summary?	(Es)	· No	
55.198	ll. Are ignitable or reactive wastes stored in tanks? If so,	Yes	Йo	
55.198(a) (1)	a) Is the waste treated, rendered, or mixed before or immediately after placement in the tank so that the resulting waste, mixture, or dissolution of materials no longer meets the definition of ignitable or reactive wastes under Parts 261.21 or 261.23 of the RCRA Regs?	Yes	No	
55.198(a))	b) Is the waste stored or treated in such a way that it is protected from any material or conditions which may cause the waste to ignite or react?	Yes	No	
55,198(b)	c) Is the owner/operator of a facility which treats or stores ignitable or reactive wastes in covered tanks in compliance with the National Fire Protection Association's (NEPA's) buffer zone requirements for tanks contained in tables 2-1 through 2-6 of the "Flammable and Combustible Code - 1977"?	Yes	No	
				•
. •	Inspector's Name:		•	
ì.	Title: QRL			
	Agency:			
	Office location:		_	
	—Date-of-Inspection:—		- <u></u>	
	Inspector's Name:			
	Title:			
	Agency:			
	Office location:			

Date of Inspection :

1	Roll official to the second se	N. 0. 555
· ,	Subpart K Section 265.222 "General Operating Requirements"	Inspection file No:
Name of Fac	Delaware City, Del 19	Reviewer:
EPA Generate	or ID Number: DFD 00 3913266	Date Reviewed:
Facility In	spection Representative: R. Timmons	Form "K"
Title:	Tech. MNGH	FOIM "K"
Telephone N	umber: 302-834-3831	
use :face	ns contained in this checklist apply to owners and operators of impoundments to treat, store, or dispose of hazardous waste, ex des otherwise.	facilities that cept as Part
Pert. Regs. 40 C.F.R. Part:	Stopusing 11-8-88	
265.222	1. Is 2 ft. of freeboard maintained in the surface impoundment	? Yes No
265.223	2. Do all earthen dikes have protective covers (e.g., grass, shale or rock) to minimize wind and water erosion and to preserve dike structural integrity?	es No
265,225(a) (1) & (2) ·	3. Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste in a surface impoundment used for storage or treatment?	to <i>N/H</i> Yes No
265.220(a) (1)	4. Is the freeboard level inspected at least once each operation day?	ng (Yes No
265.226(a) (2)	5. Is the surface impoundment, including dikes and vegetation, inspected once per week to detect leaks or deterioration or failures in the impoundment?	
	6. Are the results of these inspections recorded in an inspect log or summary?	
265.229(a)	7. Are ignitable or reactive wastes stored in a surface impoundment: If so,	"Yes No
265,229(a) (1)	a) Is the waste treated, rendered, or mixed before or immediately after placement in the impoundment so that the resulting waste, mixture or dissolution of material no longer meets the definition of ignitable or reactive waste under parts 261.21 or 261.23 of the RCRA regulati	

b) Are incompatible wastes segregated in separate surface impoundments so that spontaneous reactions are avoided?

Yes

No

Agency:	·	·
Office location:		
Date of Inspection:		
-	W. The second	. •
Inspector's Name:		
Title:		
Agency:		
Office location:		•

		MERCURY WASTE CONTAINER CHECKLIST (DRUMS & DUMPSTERS)		840
	1.	Are containers properly labelled?	Y	N
		Hazardous Waste - D009 Waste Description (Trash, graphite, etc.) Date waste put into container Retortable or Non-retortable		
	2.	Is the container properly dated?	Y	N
	з.	Are dumpsters covered?	Y	N
	4.	Are drums covered and lid secured?	Y	N
	5.	Is there any evidence of container deterior	ation Y	? N
	6.	Is there any evidence of spills?	Υ	N
12.0	7.	Amount of mercury received from retorts:		lbs.
	(P1	ber of drums moved directly to retort area: ease complete each time drums are moved.) ments:		_
		ments.		
	·			

Signature:

CELL ROOM/CELL REPAIR





Electrochemicals, Detergent & Specialty Products - Delaware City

TO:

Plant Supervision/Bulletin Boards/Contractors

FROM:

Tom Horvath

DATE:

November 7, 1988

SUBJECT: Brine Sludge Landfill

Effective Wednesday, November 9, 1988, no wastes may be placed in the brine sludge landfill. This impoundment will remain uncovered until Spring when a final cover will be installed.

Tom Horvath

mam

2046464/465	WORK ORDER U.M.	NET 35	1 SBMod1	.721	-49-913-00031	0
Tom Horvath	R. W. Moore	APPROVED BY	DELIVER TO	LOCATION	COMMODITY	2094907



OCCIDENTAL CHEMICAL CORPORATION

AS AGENT FOR
OCCIDENTAL ELECTROCHEMICALS CORPORATION
ELECTROCHEMICALS DIVISION
P.O. 80X 288 • DELAWARE CITY DELAWARE 197X-0289
302-834-3900

CHEMICAL WASTE MANAGEMENT, INC. ONE GREENTREE CENTRE - Suite 201 MARLTON, NEW JERSEY 08053

Attn: Barry Shockley

HIS NUMBER MUST APPEAR ON ALL CE RANSPORTATION PAPERS AND CORRESPOND	
B 2494	REVISION NO.

PURCHAS	E ORDER DATE	PAYN	MENT TERMS	DELIVERY DATE		ARIS TO COMPL	A MATHER SATE
	3/2/89		NET 35	1/1/89 - 12	2/31/89 SHOW	ABLE TO COMPLY N — PLEASE ADV	
X	OR TRUCK OR FREIGHT	☐ UPS ☐ RAIL	LI TANK TRUCK	JOB SITE	FRT. ALLOWED	PREPAY	& ADD
LINE NO.	QUANTITY	U/M	[Annual Cost	of this Order not to e	exceed \$200,000.00]	UNIT PRICE	EXTENDED PRICE
1			Management, Inc. certain hazardous occidental Chemic Delaware, plant of this the period from a 1989.	purchase Order Contra JANUARY 1, 1989, throu	and dispose of erated by ware City, ect shall cover igh DECEMBER 31,		
	•		rates shown in Extending the tion through the through December Chemical Waste Matimes to Occident of the lowest and	chibits A and B, attack thibits A and B, attack agreement are not su contract duration of 31, 1989. Anagement agrees to extal Chemical Corporation of the most favorable price and or provided by Chemical Corporation or provided by Chemical Chemical Chemical Chemical Chemical Chemical Chemical Chemical Chemical Chemic	tend at all on the benefit s, terms and		
		1		other customer pruch			
				eams or hazardous mate atract unless done so			
				CONTROL NO. 06652	7 (Continued)	

THIS ORDER EXPRESSLY LIMITS ACCEPTANCE TO THE TERMS ON THE FACE AND BACK HEREOF AND ANY ADDITIONAL OR DIFFERENT TERMS PROPOSED BY THE SELLER ARE OBJECTED TO AND REJECTED UNLESS EXPRESSLY ASSENTED TO IN WRITING BY THE BUYER.

OCCIDENTAL CHEMICAL CORPORATION

- INVOICE TO -

INVOICES AND APPROPRIATE TRANSPORTATION PAPERS, IN TRIPLICATE, ARE TO BE SENT TO:

OCCIDENTAL CHEMICAL CORPORATION

PIOLISON 255
DELAWARE DELLAWARE ATTN: ACCOUNTS PAYABLE

Occidental Chemic Corporation
AS AGENT FOR
OCCIDENTAL ELECTROCHEMICALS CORPORATION
ELECTROCHEMICALS DIVISION
P.O. BOX 289 • DELAWARE CITY, DELAWARE 19706-0289
302-834-3800

PCC-9016-1

PURCHASE ORDE	R CONTINUATION
D-B Z494	RELEASE NO.
3/2/89	PAGE 2 OF 3

NO. QUANTITY	∪/м	COMMODITY CODE DESCRIPTION	PRICE PER UNIT OF ISSUE	EXTENDED PRICE
		supplement authorized by the Delaware City Purchasing Department.		
	_	All terms and conditions for this contract will be in accordance with those as specified in the 6/2/86		·
		Corporation and Chemical Waste Management and disposed of in accordance with all rules, Taws, regulations and permits pertaining to the storage transfer.		
		portation and disposal of hazardous/chemical wastes.	-	
-		The Order of Precedence of the contract documents will be considered as follows:		
i		1. Exhibit A - Master Waste System Agreement (Copy already in your file)	-	* = =
		2. Face of Owner's P. O. DB 2494 dated 3/2/89		·
		3. Exhibit A - Waste Profile #E68061 COL/OAK - Description/Pricing	The second secon	territoria della del
	-	Exhibit B - Waste Profile #67881 OAK - Description/Pricing		der van v
	1	EPA Identification Numbers:		
		Occidental Chemical as Generator: Plant - Delaware City - ID #DE003913266		
		Chemical Waste Management as Disposer: ID #ALD000622464		
		Freehold Transportation as Transporter: ID #NJD054126164		
	s	Ill work performed under this contract shall be performed to the entire satisfaction of Occidental's ite representative, Mr. Thomas D. Horvath, or his esignee.		
	1 4	n order to formally execute this contract, the ttached acknowledgement copy must be signed and re-urned to the undersigned within seven (7) working days.		 - <u></u>
		(Continued)		

Occidental Chemical Corporation

ALITHODISCO	Carlotte de la carlot
MOTHORIZED	PURCHASING SIGNATURE

EXHIBIT 'A'

WASTE DESCRIPTION:

Shriver Filtercake and Retort Ash

EPA Waste ID Number K106

Waste Profile Number - #E68061 COL/OAK In effect until 10/31/89

Acceptance Letter - Contract #E-11-058-88-1

Disposal Location - Emelle, Alabama

Disposal Method - Stabilization - Secure Landfill

Shipment Method - Bulk Dumpsters

"SOFT-HAMMER" WASTES

LAND DISPOSAL RESTRICTION NOTIFICATION AND CERTIFICATION FORM

LAND DISPOSAL RESTAURS	
11 1.1 11 - 4.1	Martinet Number: 40 660 CMM Prolie Number: COI E 68 06
Generalar Namer OCC idential Chemical	COLE 68 06
EPADNIMON: NEDO039/3266	
This form is submitted to Chem Waste in accordance with 40 CFR Part 268, are box below to indicate whether alternative treatment has been found for my waste. (See	
ate box below to indicate whether alternative treatment has been sold at the s	VE TREATMENT OR RECOVERY HAS BEEN LOCATED
The soft-hammer waste I generate bottom I have identified a practically available treatment technology that yields the greatest environment technology that yields the greatest environment to demonstration in accordance with 40 CFR 268.5(a)(1), including a list of factional treatment that is practically available treatment and the practical treatment that is practically available treatment and the practical treatment and treatment	nomental benefit. Togather with the traus arapment of wester to be a complete with addresses, telephone numbers, and
	and that I have contracted to treat my waste (or will otherwise provide treatme and that I have contracted to treat my waste (or will otherwise provide treatme and in my demonstration. I believe that the information submitted is true, accurate, and
II. SOFT-HAMMER WASTE FOR WHICH DISPOSAL ONLY PRACTICAL ALTERNATIVE TO TREATMEN	IN LANDFILL OR SURFACE IMPOUNDMENT IS THE T CURRENTLY AVAILABLE
I have made a good-faith effort to locate and contract with treatment and recovery facilities out contact with treatment and recovery facilities contact whits in the waste, as an alternative to land disposal. I have found no such a submittee a compostration in accordance with 40 CFR 268.6(a)(2), including a fiat of facilities an explanation of why no treatment is practically available. This soft-hammer waste must standards until treatment standards are set for the waste or May 6, 1990, whichever occurrents.	cities and facility officials contacted, addresses, telephone numbers, contact dates, and at be disposed of in a landfill or surface impoundment moeting the minimum technological are first.
	et and that disposal in a landfill or surface impoundment is the only practical alternative to and complete. I am aware that there are significant penalties for submitting false information
III. TREATMENT OR RECOVERY FACILITY HAS TE	REATED THE WASTE
The following soft-harmmer waste(s) was stressed in accordance with the generalizes demonstra	iòn:
tion and that, based on my inquiry of those individuals immediately responsible for our tained properly so as to comply with treatment as specified in the generator's demonst cluding the possibility of fine and imprisonment.	regiment technology and operation of the treatment process used to support this certifica- aiming this information, I believe that the treatment process has been operated and main- tration. I am aware that there are significant penalties for submitting false information, in-
IMPOUNDMENT (e.g. DEEP INJECTION WELL)	DISPOSAL OTHER THAN IN LANDFILL OR SURFACE
The soft-harmon waste(s) I generate is(are)	. This waste is be- therefore is not subject to the certification and demonstration requirements of Section II.
Signature Title	Prod. M. 91 Date 11/10/80

October 13, 1988

Regional Administrator U.S. EPA, Region III 841 Chestnut Building Philadelphia, PA 19107

RE: Soft Hammer Demonstration/Certification
Occidental Chemical Corporation

Delaware City, DE 19706 EPA ID NO. DED003913266

Dear Sir:

In accordance with the Environmental Protection Agency's land, disposal restrictions governing the first third scheduled wastes, Occidental Chemical Corporation has enclosed a soft hammer demonstration and certification as per 40 CFR 268.8(a)(1) for EPA waste code K106.

The demonstration reflects our efforts to locate practically available treatment that affords the greatest environmental benefit. Based on our search for such treatment, we have determined that:

STABILIZATION is the best practically available treatment (see attached demonstration for further details).

It should be noted that prior to stabilization, the pollutant of concern, mercury, exhibits a low leachable value, as measured by the TCLP test.

If any further information is required, please contact me at 302-834-3831.

OxyChem

Occidental Chemical Corporation

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false onformation, including the possibility of fine and imprisonment.

Sincerely,

Thomas D. Horvath

Environmental Engineer

mam

SOFT NAMER DEMONSTRATIO

FAC	ILITY OWNER	LOCATION	TREATHENT HETHOD	TELEPHONE	CONTACT	DATE	EXPLANATIONA
	Cecos Int'l.	56th & Pine Ave Niagara Falls, 14304	NY	201-248-0500	Rick Wigal	9/26/88	G, J, K, O, P
2.	Envirosafe Services	876 Otter Creek Oregon, OH 43	Rd. Stabilization	n 215-962-0800	Richard Pasto	or 9/26/88	G, J, K, O, P (also not present permitted to accept K106)
3.	Chemical Waste	Alabama Highway	l7 Stabilizacion	609-243-7800	Joseph D'Ange	lo 10/5/88	; G, J, K, O, P
J .	Management	17 -	459	21,2 7,000	accept. 5 mige	.10 10/5/00	0, 0, N, 0, 1

^{*} See Attachment 4 for explanations.

ATTACHMENT 4

FIRST THIRD "SOFT-HAMMER DEMONSTRATION

- Soft-Hammer Waste For Which Alternative Treatment or Recovery Has Been Located Rotary Kiln Incineration is a practically available technology that yields the greatest environmental benefit. This waste is principally organic residues which 7__ are best destroyed by incineration. figuid Injection Incineration is a practically available technology that yields the greatest environmental benefit. This waste is principally pumpable organic 8 residues which are best destroyed by incineration. Fuels Blending is a practically available technology that yields the greatest environmental benefit. This waste has a heating value greater than or equal to 5,000 BTU per pound and can be best reused as a hazardous waste fuel. A combination of Fuels Blending, and/or Rotary Kiln or Liquid Injection D is a practically available technology that yields the greatest environmental benefit. This is due to the properties of my waste which may vary slightly, from one load to the next. Solid nondispersible residues will need to be incinerated;
- Chemical Precipitation (with filtration or decanting) is a practically available Ε technology that yields the greatest environmental benefit. This should reduce the toxicity/mobility of the hazardous constituents by reducing the toxic volume of c waste.

but the pumpable or dispersible portions may be blended for hazardous waste fuels usage (when the BTU's, chlorine, ash, etc. are within the required ranges); or el

- Filtration is a practically available technology that yields the greatest F environmental benefit. This should reduce the toxicity/mobility of the hazardous constituents by reducing the toxic volumes of the waste.
- Stabilization is a practically available technology that yields the greatest G environmental benefit. Stabilization will reduce the mobility of the hazardous constituents of the waste. I have examined recovery and destruction technologies found that they were not practically available for the following reason(s):
- Chemical oxidation is a practically available technology that yields the greates environmental benefit. Chemical oxidation will reduce the toxicity of hazardous H constituents in the waste.

This waste is not suitable for incineration or fuels due to:

Ť	the low percentage of hazardous organic constitutents presents,	
 .	the low-heating value of the waste, the high percentage of inorganic constituents present, the lack of located available capacity of incineration or fuels blending fac	ilit

This waste is not suitable for recovery due to:

incinerated.

- The hazardous constituents are present in concentations that make recovery M technologically impossible.
- The hazardous constituents are present in concentrations that make recovery N economically infeasible.
- No recovery facilities were located that could treat this type of waste. No recovery facilities were located that had capacity to treat this type of wast
- The treatment technology identified above is a past practice that has been demonstrated to meaningfully reduce the toxicity and/or mobility of the waste. Q



(As Required By The Alabama Department of Environmental Management)

IFORM HAZARDOUS NASTE MANIFEST 1. Generator's US EPA ID No. D E D O O 3 9 1 3 2 6 6 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0		_	1 Informatio	o in the	0039. Expires 9-30-88
WASTE MANIFEST D E D 0 0 3 9 1 3 2 0 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9	ifest engNg	2. Page of	is not r	equired	by Federa:
arator's Name and Mailing Address		A. State	Manifest Docu		
				016	200
cidental Chemical Corporation	100	B. State	e Generator's ID		
ver koad, belawate ofty,		C Stat	e Transporter's I	D	21695
Tomathy Name	-		sporter's Phone	AND COURSE OF THE PARTY OF THE	Market Control of the
ephold Cartage N J D 0 5 4 1 2 0 1	0 4		e Transporter's I		
risporter 2 Company Name	111		sporter's Phone	Arriva a	Haragara Bara
10. US EPA ID Number		G. Stat	e Facility's ID		
Ignated Facility Name and Site Address 10. 05 FAID Names EMICAL WASTE MANAGEMENT, INC		Tales	ility's Phone	The second secon	
Li- Facility	1.6.4	7C	5/652-97	21	
Dama Highway 17 at Mile Marker 163 ALD 0 0 0 6 2 2 2 2 2 2 3 4 4 5 5 6 6 7 8 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9	12. Conta		13	14.	
DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	No.	Туре	Total Quantity	Unit Wt/Vo	Waste No.
ezardous waste, Solid, N.O.S., ORM-E, NA 9189 , RQ			36050		
		a v	7-1	P	K-1-0-6
CWM Profite Number COLE 68061	0 0 1	CIM	117120		
CHAIR De Cha Number	1 !	-	1 1 1 1		
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certify that no absorbents were added to above uste which would prohibit its being landfilled oer RCRA 3004 (C-1). GENERATOR'S CERTIFICATION: hereby declare that the contents of this consignment are full generators.	ily and acc	curately lition fo	described above to	oy nway	
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"SOFI-HAMMER WASTES

LAND DISPOSAL RESTRICTION NOTIFICATION AND CERTIFICATION FORM

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Broker Names Occidental Chemical Corp. Meritan Number: CWMA 401662 COLE 68061
CALL Design Marrier
ADNumber: DED 003913266 CHAM Profile Number: COLE 6806 1 ADNumber: DED 003913266 Cham Waste in accordance with 40 CFR Part 268, which restricts the land disposal of certain hazardous wastes. I have marked the appropriate form is submitted to
A TOTAL CONTRACTOR OF THE PARTY
a form is submitted to
box below to indicate whether elternative treatment rate both to the control of t
K106 K106 Together with the initial shipment of waste represented by this form,
nave identified a practically available treatment technology that yields the greatest environmental technology that yields the greatest environmental technology officials contacted, complete with addresses, telephone numbers, and submitted a demonstration in accordance with 40 CFR 268.8(a)(1), including a list of facilities and facility officials contacted, complete with addresses, telephone numbers, and submitted a demonstration in accordance with 40 CFR 268.8(a)(1), including a list of facilities and facilities and facilities contacted, complete with addresses, telephone numbers, and submitted a demonstration in accordance with 40 CFR 268.8(a)(1), including a list of facilities and facility officials contacted, complete with addresses, telephone numbers, and submitted a demonstration in accordance with 40 CFR 268.8(a)(1), including a list of facilities and facilities and facilities and facilities are submitted.
actically available technology which yields the greatest for submitting false information, including the possibility of fine and imprisonment.
THE PROPOSAL IN LANDFILL OR SURFACE IMPOUNDMENT TO
ONLY PRACTICAL ALTERNATIVE TO TREATMENT CURRENTLY AVAILABLE
have made a good-taith effort to locate and contract with treatment and recovery facilities practically available which can meaningfully reduce the toxicity or mobility of hazard- have made a good-taith effort to locate and contract with treatment and recovery facilities practically available which can meaningfully reduce the toxicity or mobility of hazard- nus constituents in the waste, as an elternative to land disposal. I have found no such alternative facility. Together with the initial shipment of waste represented by this form, I nubmitted a demonstration in accordance with 40 CFR 268.9(a)(2), including a list of facilities and facility officials contacted, addresses, telephone numbers, contact dates, and nubmitted a demonstration in accordance with 40 CFR 268.9(a)(2), including a list of facilities and facility officials contacted, addresses, telephone numbers, contact dates, and nubmitted a demonstration in accordance with 40 CFR 268.9(a)(2), including a list of facilities and facility officials contacted, addresses, telephone numbers, contact dates, and nubmitted a demonstration in accordance with 40 CFR 268.9(a)(2), including a list of facilities and facility officials contacted, addresses, telephone numbers, contact dates, and numbers are accordance with 40 CFR 268.9(a)(2), including a list of facilities and facility officials contacted, addresses, telephone numbers, contact dates, and numbers are accordance with 40 CFR 268.9(a)(2), including a list of facilities and facility officials contacted, addresses, telephone numbers, contact dates, and numbers are accordance with 40 CFR 268.9(a)(2), including a list of facilities and facility officials contacted, addresses, telephone numbers, contacted, addresses, telephone numbers, contacted, addresses, telephone numbers, contacted, addresses, telephone numbers are accordance with 40 CFR 268.9(a)(2), including a list of facilities and facility officials contacted, addresses, telephone numbers, contacted, addresses, telephone numbers, contacted, addresses, t
"I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false informations, including the possibility of fine and imprisonment."
III. TREATMENT OR RECOVERY FACILITY HAS TREATED THE WASTE
The total soft-harmoner weath(s) were treated in accordance with the generator's demonstration;
I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process has been operated and maintion and that, bood on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintion and that, bood on my inquiry of those individuals immediately responsible for obtaining this information, I am aware that there are significant penalties for submitting talse information, intering properly so as to comply with treatment as specified in the generator's demonstration. I am aware that there are significant penalties for submitting talse information, in-
cluding the possibility of fine and imprisonment.
IV. SOFT-HAMMER WASTE DESTINED FOR LAND DISPOSAL OTHER THAN IN LANDFILL OR SURFACE IMPOUNDMENT (e.g. DEEP-INJECTION WELL)
demonstration requirements of Section II.
The soft-hammer weaks(s) I generate in(sre) Ing disposed of in a land disposed unit other than a landfill or surface impoundment and therefore is not subject to the certification and demonstration requirements of Section II.
Someway Some Stones Date 11/1/88





HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

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I	UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. D E D O O 3 9 1		lanifest Impntalo.	2. Page of		on in the shaded areas required by Federal		
	3. Generator's Name and Mailing Address		<u> </u>	<u> </u>	A SUM MARKET DOWNER NUMBER				
	Occidental Chemical Corpor	ation			C	VIALE, I	:UL 661		
	kiver Road, Delaware City,		CONTRACTOR OF STREET						
	4. Generator's Phone (302) 834-38		P 7.4						
	5. Transporter 1 Company Name	9r 1. K. A		A THE MANUFACTURE OF					
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H	Alabama Highway 17 at Mile Marker 163	. A. L. D	0 0 0 6 2 2 2	41614	14065	iya Phone 5/857-07/	21		
	Emelle, Alabama 35459			12. Cont		13.	14.		
l	11. US DOT Description (Including Proper Shipping	Name, Hezard Class, and ID	Number)	No.	Туре	Total - Quantity	Unit Wt/Vo		
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l	waste which would probib								
Ш	per RCRA 3004 (C-1).		• •			_			
Н	16. GENERATOR'S CERTIFICATION: I hereby of proper shipping name and are classified, pack	eclare that the contents of the	is consignment are full	ly and accur	rately des	cribed above by	y		
	according to applicable international and natio	nal government regulations.							
	If I am a large quantity generator, I certify that economically practicable and that I have select	ed the practicable method of t	eatment, storage, or di-	sposal curr	ently avai	lable to me which	minimizes the present and		
1	future threat to human health and the environi the best waste management method that is as	nent; OR, if I am a small quant	ity generator, i have ma	ade a good f	aith effor	t to minimize my w	raste generation and select		
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LAND DISPOSAL RESTRICTION NOTIFICATION AND CERTIFICATION FORM FIRST-THIRD WASTES FOR WHICH NO TREATMENT STANDARDS HAVE BEEN SET ("SOFT-HAMBER" WASTES RESTRICTED AS OF AUGUST 8. 1988)

Generator Name:	OCCIDENTAL CHEMICAL	CWM Profile Number:	68061
EPA ID Number:	DE DO0391376	Manifest Mumber: CWAS	Un 1663

This form is submitted to Chemical Wash Mangia accordance with 40 CFR Part 268, which restricts the land disposal of certain hazardous wastes. I have marked the appropriate box below to indicate whether alternative treatment has been found for my waste. (See reverse side for the list of "soft-hammer" wastes and instructions on using this form.) 11874 g

Хъ. SOFT-HAMMER WASTE FOR WHICH ALTERNATIVE TREATMENT OR RECOVERY HAS BEEN LOCATED

The soft-hammer waste I generate is(are) K105 . There identified a practically available treatment technology that yields the greatest environmental benefit. Together with the initial shipment of waste represented by this form, I submitted a demonstration in accordance with 40 CFR 268.8(a)(1), including a list of facilities and facility officials contacted, complete with addresses, telephone numbers, and contact dates and a justification that I have chosen the best treatment that is practically symilable.

I certify under penalty of law that the requirements of 40 32 268.8(a)(1) have been uset and that I have contracted to treat my waste (or will etherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted in true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the pessibility of fine and imprisonment.

SOFT-HAMMER WASTE FOR WHICH DISPOSAL IN LABOFILL OF SUBFACE HEPOURDHENT IS THE OHLY PRACTICAL ALTERNATIVE TO TREATMENT CURRENTLY AVAILABLE

The soft-hammer waste(s) I generate or have treated is(are) .a. I-bave made a good-faith effort to locate and contract with treatment and recovery facilities to some practically available which can meaningfully groduce the toxicity oromobility of the the hazardous constituents in the waste, as an alternative to land disposal. I have found where no such alternative facility. Together with the initial shipment of waste represented by this form, I submitted a demonstration in accordance with 40 CFR 268.8(a)(2), including a list of facilities and facility officials contented, addresses, telephone numbers, contact dates, and a discussion of why so treatment is practically available. This soft-barner westermust the disposed of tis as deadfill for surface impossings the disposed standards excitatestrate standards excitatestrate and standards are set for the section of waste or Hay 8, 1990, whichever occurs first. wis pay only or annua superiors yes pulsured sought.

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that disposel in a landfill or surface impoundment is the only practical alternative to treatment terrently available; "I believe that the information sub-" mitted is strue, accurate, and complete. I am onere that there are significant as on the penalties for esthetiting false informations, elaciteding the possibility of fine and imprisonment. West off as which we have 50. **8004**0 SATE LET ME 97 MARK 18 15 TO MINE OF STAIL THE

III. TREATHENT OR RECOVERY PACILITY HAS THEATED THE WASTE PRATTICE OF THE CONTROL OF THE PARTY.

4. 2 682

The following soft-harmer waste(s) was treated in accordance with the generator's demonstration:

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of these individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with treatment as specified in the generator's demonstration. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

IV. SOFT-MANNER WASTE DESTINED FOR LAND DISPOSAL OTHER THAN IN LANDFILL OR SURFACE IMPOUNDMENT (e.g. DEEP INJECTION WELL)

The soft-hanner waste(s) I generate is(are) . This waste is being disposed of in a land disposal unit other than a landfill or surface impoundment and therefore is not subject to the certification and demonstration requirements of Section I, II or III.

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AZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management).

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J	Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459.	D 0 0 0 0 6 2 1 2	4-6-4		* 4 4.4	
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ŀ	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and I	D Number)	No.	Type		Unit Vt/Vol
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t	according to applicable international and national government regulations	S 5.				•
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l	economically practicable and that I have selected the practicable method o	of treatment, storage, or di antity generator. I have m	isposal curre ade a good f	ently availab aith effort to	minimize my w	aste generation and select
ľ	the best waste management method that is available to me and that I can	n afford.		7		
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7	EPA Form 8700-22 4Rev. 9-86) Previous edition is obsolete.		F 1 -			

LAND DISPOSAL RESTRICTION NOTIFICATION AND CERTIFICATION FORM FIRST-THIRD WASTES FOR WHICH NO TREATMENT STANDARDS HAVE BEEN SET ("SOFT-HAMMER" WASTES RESTRICTED AS OF AUGUST 8, 1988)

Generator Name: Occio Lion Cittorin Carro CWM Profile Number: 63061

EPA ID Number: DEO 09 3G13366 Manifest Number: Cum4 401669

This form is submitted to CHAPLEN W.4576 MMC in accordance with 40 CFR Part 268, which restricts the land disposal of certain hazardous wastes. I have marked the appropriate box below to indicate whether alternative treatment has been found for my waste. (See reverse side for the list of "soft-hammer" wastes and instructions on using this form.)

X I. SOFT-HAMMER WASTE FOR WHICH ALTERNATIVE TREATMENT OR RECOVERY HAS BEEN LOCATED

The soft-hammer waste I generate is(are) KiO6. I have identified a practically available treatment technology that yields the greatest environmental benefit. Together with the initial shipment of waste represented by this form, I submitted a demonstration in accordance with 40 CFR 268.8(a)(1), including a list of facilities and facility officials contacted, complete with addresses, telephone numbers, and contact dates and a justification that I have chosen the best treatment that is practically available.

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

II. SOFT-HAMMER WASTE FOR WHICH DISPOSAL IN LANDFILL OR SURFACE IMPOUNDMENT IS THE ONLY PRACTICAL ALTERNATIVE TO TREATMENT CURRENTLY AVAILABLE

The soft-hammer waste(s) I generate or have treated is(are)

good-faith effort to locate and contract with treatment and recovery facilities practically available which can meaningfully reduce the toxicity or mobility of hazardous constituents in the waste, as an alternative to land disposal. I have found no such alternative facility. Together with the initial shipment of waste represented by this form, I submitted a demonstration in accordance with 40 CFR 268.8(a)(2), including a list of facilities and facility officials contacted, addresses, telephone numbers, contact dates, and a discussion of why no treatment is practically available. This soft-hammer waste must be disposed of in a landfill or surface impoundment meeting the minimum technological standards until treatment standards are set for the waste or May 8, 1990, whichever occurs first.

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting felse informations, including the possibility of fine and imprisonment.

III. TREATHENT OR RECOVERY FACILITY HAS TREATED THE WASTE

The following soft-homer waste(s) was treated in accordance with the generator's demonstration:

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification—and—that,—based—on—my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with treatment as specified in the generator's demonstration. I am aware that there are significant penalties for submitting felse information, including the possibility of fine and imprisonment.

IV. SOFT-HAMMER WASTE DESTINED FOR LAND DISPOSAL OTHER THAN IN LANDFILL OR SURFACE INFOUNDMENT (e.g. DEEP INJECTION WELL)

The soft-hanner waste(s) I generate is(are) ______. This waste is being disposed of in a land disposel unit other than a landfill or surface impoundment and therefore is not subject to the certification and demonstration requirements of Section I, II or III.

Fenre Eng. C.	1/9/89	Them Alfon A
Title	Date	Signature



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

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"SOFT-HAMMER" WASTES

LAND DISPOSAL RESTRICTION NOTHICATION AND CERTIFICATION FORM

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/	ing disposed of in a larve disposal unit orber than a landfill or authors impoundment and then
d al draw aff .	(ena) na namente la (a) namente merennel dos esti
-	INPOUNDMENT (e.g. DEEP INJECTION WELL)
SPOSAL OTHER THAN IN LANDFILL OR SURFACE	
·	cluding the possibility of fine and imprisonment.
g this information, I believe that the treatment process has been operated and main	I certify under penalty of law that I have personally examined and am familiar with the trees took and that, based on my inquiry of these individuals immedially responsible for obtaining that the trees individuals in the generally as as one people in the generalist demonstration
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	an explanation of why no treatment is practically available. This soft-harmner were smust be remained until treatment standards are set for the waste or May 8, 1990, whichever occurs
	submitted a demonstration in accordance with 40 CFR 258.8(a)(2), including a list of facility
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HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Flea	ase print or type. (Form designed for use on elite (12-pitch) typewriter.)					Form Approved, CMB No. 2050-0039, Expires 9-30-88							
A	UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID D E D O O 3 9	No. 1 3 2 6 6 0 0	Manifest ument No	2, Pa 8 of	1	is not law.	requi	the shaded areas red by Federal				
	3. Generator's Name and Mailing Address Occidental Chemical Corp Kiver Road, Delaware Cit	poration			A.St	A State Manifest Document Number CWMA 401669 B. State Generator's ID							
	4. Generator's Phone (302) 634-38	-, -	US EPA ID Numb		C: State Transporter's ID								
	5. Transporter 1 Company Name Freehold Cartage		D 0 5 8 1 2 6			insporte	's Phone	. 201	L-462-1001				
	7. Transporter 2 Company Name	8.	US EPA ID Numb	oer			sporter a	·	\$ 1				
l						x	ity's ID	F .	and the				
	CHEMICAL WASTE MANAGEMENT, INC.								A MARTIN				
	Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459	• At 1: 15 H: U: H: D: 2: 2: 4: K: 4: I					1000 12-97						
	11. US DOT Description (Including Proper Shippin	ng Name, Hazard Class, and	ID Number)	12. Co No.	ontainers Type	_1	13. otal antity	14. Unit Wt/Vo	Weste No.				
G E N	Hazardous Waste, Solid, (X106), NEK RQ					2.7.	1.4.0		X 106				
8	ь.	CWM Profile Number	COLE 08001 _	10 10 1	1 CIH	1211	1//~	P	L L U B				
А Т О Я		CWM Profile Number							1				
	<u>c.</u>	CWM Profile Number					1 1						
	d.			 	_				1 1 4 5 1 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0				
П		CWM Profile Number		1 1			1 1	<u> </u>	* * * * * * * * * * * * * * * * * * *				
	J. Additional Descriptions for Materials Listed Above					ndling C	odes for V	Vestes L	isted Above				
Н			_	Hercury contaminated shriver filtercake and retort ash.					a. D-84				
			e and retort	așb.	a.	D-8	4	C.	1gen.				
	Mercury contaminated shi	river filtercak DC	e and retort	eęh.	a. b.	D-8 Landf	111	. c. ď.	ego				
	OXY 570. /M DB2494-01. Special Handling Instructions and Addition I certify that no absort waste which would prohit per RCRA 3004 (C-1).	river filtercak DC Tal Information bents were adde bit its being I	d to above andfilled		b. Av	oid s	kin c		c t .				
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"SOFT-HAMMER" WASTES

LAND DISPOSAL RESTRICTION NOTIFICATION AND CERTIFICATION FORM

	mxOccidental_Che	mical_Corp.	Manifest Number: CWMA 4	01669
EPA DNIm	DED003913266		CMM Profite Number: COLE	68061
	AN IN HERCETO MINICIPAL SERVICIONES AS	in accordance with 40 CFR Part 206, which segment has been found for my waste. (See rew	erse side for the list of "soft-harmner" wastes	and instructions on using this form.)
		TE FOR WHICH ALTERNATIVE	TREATMENT OR RECOVERY	HAS BEEN LOCATED
I have iden I submitted	e desirouses enqui su secretorado Alia	int technology that yields the greatest environment to CFR 268.6(a)(1), including a list of facilities paint the best treatment that is practically available	and facility officials contacted, complete with	nt of waste represented by this form, addresses, telephone numbers, and
complete. I	am aware that there are significant	ents of 40 CFR 268.8(a)(1) have been met and it is greatest environmental benefit, as indicated in penalties for submitting false information, includi-	my demonstration. I believe that the informing the possibility of fine and imprisonment.	ation aubmitted is true, accurate, and
□"	SOFT-HAMMER WAS ONLY PRACTICAL AL	TE FOR WHICH DISPOSAL IN I TERNATIVE TO TREATMENT CL	LANDFILL OR SURFACE IMP JRRENTLY AVAILABLE	OUNDMENT IS THE
i have made ous constitu	and u sa arris, or at Schiff M	potract with treatment and recovery facilities pra- to land disposal. I have found no such alternal 40 CFR 288.8(a)(2), including a list of facilities a	W facility. Together with the initial eligence	
m: 44444 #0	ou or any to seement is builded.	y available. This soft-hammer waste must be die he waste or May 8, 1990, whichever occurs first.	cosed of in a land!!! or surface improved mer	ephone numbers, contact dates, and it meeting the minimum technological
A A STATE OF	or penalty of law that the requirems mently available. I believe that the ng the possibility of line and impriso	inte of 40 CFR 258.8(a)(1) have been met and st information submitted is true, accurate, and com numers."	at disposal in a landfill or surface impoundm plate. I am estere that there are significant ;	ent is the only practical elemetive to renalties for aubmitting false informs-
] m.	TREATMENT OR REC	OVERY FACILITY HAS TREATE	D THE WASTE	
	ach-hammer washi(a) was tracked in	accordance with the generator's demonstrator:	~	·
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certify under control under the control under control unde	r pensity of law that I have person, based on my inquiry of those inci- rly so as to comply with treatment ossibility of fine and imprisonment. SOFT-HAMMER WAS IMPOUNDMENT (e.g. Distribution) of in a land disposal unit other than	thy commined and am familiar with the treatment viduals immediately responsible for obtaining this aspectified in the generator's demonstration. It is DESTINED FOR LAND DISPORT	e information, I believe that the treatment prism aware that there are algorificant penalties DSAL OTHER THAN IN LANG Is not subject to the certification and demons	ocess has been operated and main- ifor submitting false information, in- DFILL OR SURFACE This waste is be- traffon requirements of Section II.





EPA Form 8700-22 (Rev. 9-86) Previous edition is obsolete.

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

I	UNIFORM HAZARDOUS	1. Generator's US EPA ID No.	M	anifest	2. Pag		ion in	the shaded	areas			
1	WASTE MANIFEST	949943943	2 9 9 9°9	mant do o	of	I law.		ed by Fe	derai			
	3. Generator's Name and Mailing Address				A State Manifest Document Number							
	Occidental Chemical Corpor		CWMA 401670									
	River Road, Delaware City,	River Road, Delaware City, DE 19706 4. Generator's Phone (302) 834-3856						B. State Generator's ID				
1	4. Generator's Phone (302) 834-3 5. Transporter 1 Company Name		JS EPA ID Numbe		C 8000	a Transporter a			265			
	Freehold Cartage					reporter's Phone			Z JYA			
1	7. Transporter 2 Company Name	8. I	JS EPA ID Numbe	1 0 4 r	A	• Transporter's	Company of the contract of	-462-1	11/00			
	Freehold Carrage	בחות דומו	141126	11614	F. Tres	sporter's Phone	AT.	601	100			
1	9. Designated Facility Name and Site Address	is 100	JS EPA ID Numbe	,	Name and Address of the Owner, where the Owner, which is th	a facility's ID		to et it	~			
	CHEMICAL WASTE MANAGEMENT, IN	C. //			77			10-50				
1	Emelle Facility Alabama Highway 17 at Mile Marker 163				\$500 TO 1000 TO 1000	lity's Phone			Tact.			
L	Emelle, Alabama 35459	1 A L D 0	0 0 6 2 2 2	4 6 4	20	5/652-97	21	100	10 M			
-	11. US DOT Description (Including Proper Shippin	g Name, Hazard Class, and ID Numb	peri	12. Cont	ainers	13. Total	14. Unit	40.00				
P				No.	Туре	Quantity	Wt/Vo	West	No.			
١,	Hazardous Waste, Solid,	N.O.S., OKM-E, NA9	189,	0 0 1	0 1		_	400	1275			
	(K106), RQ	CWM Profile Number E680	61 COT COAR	0 0 1	C M	24.930	P					
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L	J. Additional Descriptions for Materials Liste	CWM Profile Number			Ш	dling Codes for M						
100	Mercury contaminated Sh Oxy P.O. #DB2494-03DC	river filtercake and	d retort a	sh.	F 712 - 1206 CO.	n-84 andfill	STc.					
	Special Handling Instructions and Addition	al Information							***			
-	I certify that no absorwaste which would prohiper RCRA 3004 (C-1).				-Avo	id skin o	onta	ct.	./			
	16 GENERATOR'S CERTIFICATION: I hereby proper shipping name and are classified, pack according to applicable international and national and page 16.	ed, marked, and labeled, and are in					ау					
	If I am a large quantity generator, I certify that economically practicable and that I have select future threat to human health and the environ the best waste management method that is a	ted the practicable method of treatme ment; OR , if I am a small quantity ger	ent, storage, or dis	posal curre	ntly ava	lable to me which	minimiz	es the prese	nt and			
1	Printed/Typed Name	Signatu	0/1/		To		3	Month Da	y Year			
1	Alan L. Imler	1	Hant.	5	V-			0 4 0	11819			
I	17.Transporter 1 Acknowledgement of Receip	t of Materials	0		72							
	Printed/Typed Name	Signatu		, <		٨		Month Da				
L	P: Mr Down	5	Jul	T)	w	71		OPIO	11819			
1	18.Transporter 2 Acknowledgement of Receip		V)								
	Printed/Typed Name	Signatu	Λ	200		* * *	- 100 - 100 - 100 - 100	Month Da				
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1	19.Discrepancy Indication Space		:	. ()								
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H	20.Facility Owner or Operator: Certification of	receipt of hazardous materials	covered by this	manifeet	except a	s noted in Item	19					
1	Printed/Typed Name	Signatu		1	work a	a notau in itan	. 13.	Month Da	y Year			
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"SOFT-HAMMER" WASTES

LAND DISPOSAL RESTRICTION NOTIFICATION AND CERTIFICATION FORM

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CERTIFIED MAIL

October 13, 1988

OCT 18 1988

EPA, REGION III

Regional Administrator U.S. EPA, Region III 841 Chestnut Building Philadelphia, PA 19107

RE: Soft Hammer Demonstration/Certification

Occidental Chemical Corporation

Delaware City, DE 19706 EPA ID NO. DED003913266

Dear Sir:

In accordance with the Environmental Protection Agency's land disposal restrictions governing the first third scheduled wastes, Occidental Chemical Corporation has enclosed a soft hammer demonstration and certification as per 40 CFR 268.8(a)(1) for EPA waste code K106.

The demonstration reflects our efforts to locate practically available treatment that affords the greatest environmental benefit. Based on our search for such treatment, we have determined that:

STABILIZATION is the best practically available treatment (see attached demonstration for further details).

It should be noted that prior to stabilization, the pollutant of concern, mercury, exhibits a low leachable value, as measured by the TCLP test.

If any further information is required, please contact me at 302-834-3831.

OxyChem

Occidental Chemical Corporation

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false onformation, including the possibility of fine and imprisonment.

Sincerely,

Thomas D. Horvath

Environmental Engineer

Thomas Deformate

mam

SOFT HAMMER DEMONSTRATION

FACILITY OWNER	LOCATION	TREATMENT METHOD	TELEPHONE	CONTACT	DATE	EXPLANATION*
1. Cecos Int'1.	56th & Pine A Niagara Falls 143	-	201-248-0500	Rick Wigal	9/26/88	G, J, K, O, P
Envirosafe Services	876 Otter Cre Oregon, OH	eek Rd. Stabilizatio 43616	n 215-962-0800	Richard Pasto	or 9/26/88	G, J, K, O, P (also not presently permitted to accept K106)
 Chemical Waste Management 	- 1	way 17 Stabilization 35459	609-243-7800	Joseph D'Ange	elo 10/5/88	G, J, K, O, P

^{*} See Attachment 4 for explanations.

ATTACHMENT 4

FIRST THIRD "SOFT-HAMMER DEMONSTRATION
Soft-Hammer Waste For Which Alternative Treatment or Recovery Has Been Located

- Rotary Kiln Incineration is a practically available technology that yields the greatest environmental benefit. This waste is principally organic residues which are best destroyed by incineration.
- B Liquid Injection Incineration is a practically available technology that yields the greatest environmental benefit. This waste is principally pumpable organic residues which are best destroyed by incineration.
- Fuels Blending is a practically available technology that yields the greatest environmental benefit. This waste has a heating value greater than or equal to 5,000 BTU per pound and can be best reused as a hazardous waste fuel.
- A combination of Fuels Blending, and/or Rotary Kiln or Liquid Injection is a practically available technology that yields the greatest environmental benefit. This is due to the properties of my waste which may vary slightly, from one load to the next. Solid nondispersible residues will need to be incinerated; but the pumpable or dispersible portions may be blended for hazardous waste fuels usage (when the BTU's, chlorine, ash, etc. are within the required ranges); or else incinerated.
- E Chemical Precipitation (with filtration or decanting) is a practically available technology that yields the greatest environmental benefit. This should reduce the toxicity/mobility of the hazardous constituents by reducing the toxic volume of the waste.
- Filtration is a practically available technology that yields the greatest environmental benefit. This should reduce the toxicity/mobility of the hazardous constituents by reducing the toxic volumes of the waste.
- G Stabilization is a practically available technology that yields the greatest environmental benefit.

 I have examined recovery and destruction technologies found that they were not practically available for the following reason(s):
- H Chemical oxidation is a practically available technology that yields the greatest environmental benefit. Chemical oxidation will reduce the toxicity of hazardous constituents in the waste.

This waste is not suitable for incineration or fuels due to:

- I the low percentage of hazardous organic constitutents presents,
- J the low heating value of the waste,

4. A . 1 .

K the high percentage of inorganic constituents present,
the lack of located available capacity of incineration or fuels blending facilities

This waste is not suitable for recovery due to:

- The hazardous constituents are present in concentations that make recovery technologically impossible.
- N The hazardous constituents are present in concentrations that make recovery economically infeasible.
- No recovery facilities were located that could treat this type of waste.

 No recovery facilities were located that had capacity to treat this type of waste
- The treatment technology identified above is a past practice that has been demonstrated to meaningfully reduce the toxicity and/or mobility of the waste.